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October 30, 2023

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

BY: Laura Loera  
DEPUTY

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

PAOLA DOMINGUEZ,

*Plaintiff,*

v.

MILBERG COLEMAN BRYSON PHILLIPS  
GROSSMAN, PLLC, a Tennessee Professional  
Limited Liability Company

*Defendant.*

**CASE NO. 3:23-CV-00175-KC**

**PLAINTIFF'S OPPOSED MOTION FOR LEAVE TO FILE PLAINTIFF'S RESPONSE  
TO DEFENDANT'S MOTION TO DISMISS OUT OF TIME**

Plaintiff respectfully petitions this court for leave to file Plaintiff's response to Defendant's Motion to Dismiss, despite the expiration of the prescribed time frame. Plaintiff is fully aware of the established response deadline. However, due to her forced relocation from the registered address, a measure taken for reasons of personal safety, she was rendered incapable of meeting the deadline for the timely filing of her response. Dkt 31.

Plaintiff filed her Original Complaint on April 28, 2023, against Defendant Milberg Coleman Bryson Phillips Grossman, PLLC ("Milberg"). Milberg filed their Motion to Dismiss on July 21, 2023.

Plaintiff therefore respectfully petitions the Court to consider accepting Plaintiff's Response to Milberg's Motion to Dismiss.

October 27, 2023

Respectfully submitted,



Paola Dominguez  
Plaintiff, Pro Se  
2316 Bill Howard Pl.  
El Paso, TX 79936  
915-383-6911  
pdomin14@gmail.com

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that that on October 24, 2023, Plaintiff engaged in a conference with the opposing counsel, with the intention of seeking permission to amend Plaintiff's Original Complaint. However, the opposing party expressed their opposition to the proposed submission.

Dated: October 27, 2023

Respectfully Submitted,



Paola Dominguez  
Plaintiff, Pro Se  
2316 Bill Howard Pl.  
El Paso, TX 79936  
915-383-6911  
pdomin14@gmail.com

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document has been filed with the Court and served upon all known counsel on record via the Court's electronic filing system and/or electronic mail October 27, 2023.

Dated: October 27, 2023,

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Paola Dg", written in a cursive style.

Paola Dominguez

Plaintiff, Pro Se

2316 Bill Howard Pl.

El Paso, TX 79936

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